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Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re:		Chapter 11
BLOCKFI INC., et al.,		Case No. 22-19361 (MBK)
	Debtors. ¹	(Jointly Administered)

APPLICATION FOR ORDER SHORTENING TIME

TO: THE HONORABLE CHIEF JUDGE MICHAEL B. KAPLAN UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY:

The above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") by and through their undersigned counsel request that the time period to notice a hearing on the *Debtors*'

The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965); and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

Supplemental Motion for Entry of an Order (I) Conditionally Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures, (III) Approving the Forms of Ballots and Notices In Connection Therewith, (IV) Scheduling Certain Dates With Respect Thereto, and (V) Replying to Objections to the Disclosure Statement (the "Supplemental Motion") as required by Fed. R. Bankr. P. 2002 be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reason(s) set forth below:

- 1. In light of the comprehensive settlement between the Debtors, the Committee Settlement Parties,² and the Committee (the "Committee Settlement"), the Debtors amended the Plan and the Disclosure Statement in a number of respects to implement the terms of the Committee Settlement.
- 2. To effectuate the Committee Settlement and ensure that distributions are made to the Debtors' Clients expeditiously, the Debtors request that the Court schedule a hearing on the Supplemental Motion on August 1, 2023.
 - 3. Reduction of the time period is not prohibited under Fed. R. Bankr. P. 9006(c)(1).
- 4. The Debtors request entry of the proposed order shortening time in the form attached hereto as **Exhibit A**.

[Remainder of page intentionally left blank]

[&]quot;Committee Settlement Parties" means Zac Prince, Flori Marquez, Amit Cheela, Jonathan Mayers, Rob Loban, Tony Lauro, Yuri Mushkin, Andrew Tam, David Spack, and all other Persons who served as officers or directors of the Debtors during these Chapter 11 Cases, including Alan Carr, Jill Frizzley, Scott Vogel, Jennifer Hill, Harvey Tepner, and Pamela Corrie.

WHEREFORE, the Debtors request that the Court enter an order, in substantially the form submitted herewith, granting the relief requested herein and such other relief as is just and proper under the circumstances.

Dated: July 31, 2023

/s/ Michael D. Sirota

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